

REMARKS

Applicant notes with appreciation Examiner's indication of allowable subject matter and requests favorable reconsideration of this application as amended.

Claim 15 has been amended to correct an obvious clerical error in order to address the technical rejection under 35 U.S.C. 112, second paragraph, and is not intended as a narrowing amendment. Likewise, allowed claim 11 has been amended to correct an obvious clerical error and not for any reason related to patentability and not to narrow the claim.

Claims 5-14 and 23-26 were allowed. Claims 15-22 stand rejected and will be discussed below. New Claims 27 and 28 have been added to provide more comprehensive protection for Applicant's invention.

The rejection of Claim 15 under 35 U.S.C. 102(e) is respectfully traversed. According to the Office action, Figure 19 of Kondo shows a motion detector 6 that must include a memory cell. (Office Action dated July 1, 2005, pages 3-4). The structure of motion detector 6 is detailed in Kondo's Figure 9, which confirms that motion detector 6 does indeed include a memory cell 53 for storing a datum sensed at a first time. Figure 9 further shows a **different** memory cell 54 for storing a datum sensed at a second time, and a separate difference detecting circuit 57 for comparing memory cell 53 and memory cell 54. However, claim 15 recites *inter alia* storing and interacting the first datum and the second datum both in the **same** individually addressable memory cell, and outputting from that cell digital data compressed in accordance with the result of the interaction in the single cell. Accordingly, the rejection of Claim 15 is untenable and should be withdrawn.

Claim 20 is allowable for at least the reason discussed above regarding Claim 15.

New Claim 27 is allowable for at least the reason given above regarding claim 15.

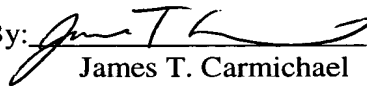
New Claim 28 is allowable because it depends from allowed Claim 7.

Should the Examiner believe that further amendments are necessary to place the application in condition for allowance, or if the Examiner believes that a personal interview would be advantageous in order to more expeditiously resolve any remaining issues, the Examiner is invited to contact Applicant's undersigned attorney at the telephone number listed below.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (Attorney Docket No. T3707-908215) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

Respectfully submitted,

JTC:swa

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